

Colorado Department of Public Health and Environment

OPERATING PERMIT

The Western Sugar Co. - Greeley Facility 95OPWE083

ISSUED: December 1, 1998 LAST REVISED: July 10, 2002

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: The Western Sugar OPERATING PERMIT NUMBER

Coop-Greeley Facility

FACILITY ID: 1230002

December 1, 1998 December 1, 2003

MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Quality Control Act, 25-7-101 et seq. (1989 & 1995 Supp.) and applicable rules and regulations.

950PWE083

ISSUED TO: PLANT SITE LOCATION:

The Western Sugar Cooperative 1302 First Avenue

1302 First Avenue City of Greeley, Weld County, Colorado

Greeley, CO 80631

ISSUE DATE:

EXPIRATION DATE:

INFORMATION RELIED UPON

Operating Permit Application Received: 12/7/95 And Additional Information Received: 11/4/97

Nature of Business: Manufacture of Sugar and By-Products from Sugar Beets

Primary SIC: 2063

RESPONSIBLE OFFICIAL

Name: Mr. Inder K. Mathur

Title: President

FACILITY CONTACT PERSON

Name: Mr. Richard Kraus

Title: Factory Manager

Phone: (303) 813-3519 Phone: (970) 304-6027

SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: March - August, September - February

Semi-Annual Monitoring Report: April 1, 1999 & October 1, 1999 and subsequent years

Annual Compliance Period: Begins March 1 to End of February
Annual Compliance Certification: Due April 1, 1999 and subsequent years

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility consists of one natural gas fired steam boiler, one natural gas fired beet pulp dryer with cyclone, three beet pulp pellet mills with dust collector, one sugar granulator (one dryer and one cooler) with dust boxes and wet scrubbers, sugar storage bin dust collection system, lime slaker vent, and fugitive emissions from truck transport and factory grounds.

The facility is located on the eastern side of the city of Greeley, immediately south of the Cache La Poudre River in Weld County, Colorado. The area in which the plant operates is designated as non- attainment for Carbon Monoxide (CO). Wyoming is an affected state within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 96WE674, 86WE291F.
- 1.4 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 21 of the General Conditions in Section IV of this permit. All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. The state only conditions are not enforceable by the EPA under Section 303 of the Federal Clean Air Act. **State-only enforceable conditions** are:

Permit Condition Number(s): Section IV - Conditions 13, 17(as noted)

1.5 There are no other Operating Permits associated with this facility.

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1.6 All information gathered pursuant to the requirements of this permit is subject to the recordkeeping and Reporting requirements listed under Condition 21 of the General Conditions.

2. Alternative Operating Scenarios

- 2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.
 - 2.1.1 The facility is scheduled to replace and upgrade the control equipment for S005.
 - 2.1.1.1 For S005, Section II, Conditions 5.1 5.3 (S005a) shall apply so long as the Wheelabrator control device is in place and operating.
 - 2.1.1.2 For S005, Section II, Conditions 5.4 5.7 (S005b) shall apply after the removal of the Wheelabrator control device and the installation of replacement control equipment.

3. Accidental Release 112(r)

3.1 This facility is not subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).

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4. Summary of Emission Units

4.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
S001	009		B&W Model FM-120#97C, SN: FM-28(93,94, or 95 - to be determined upon installation), natural gas fired steam boiler design heat input rated at 215.9 MMBTU/hr.	Low NOx Burners
S004a & S004b	003		One Sugar Granulator consisting of a) One Steam Heated Rotary Dryer and b) One Ambient Air Cooled Rotary Cooler. Emissions from the dryer are vented to a dust box and then wet scrubbers and from the cooler to a baghouse dust collector.	In House Designed Dust Box and In House Designed Wet Scrubber on Dryer. Sly TubeJet PulseJet Baghouse on Cooler.
S005a	006		Conveyor Transfer Points and Silo Filling. Dust is Picked up from the Transfer Points, Loading Areas, and from the Displacement of Air from Silo Filling.	Wheelabrator, Model 126-D Sock Type Dust Collector.
S005b			Conveyor Transfer Points and Silo Filling. Dust is Picked up from the Transfer Points, Loading Areas, and from the Displacement of Air from Silo Filling.	Sly PleatJet Baghoue for Dust Collection from Conveying, Elevators, Production Scales, and Screens. MicroPulsaire Baghouse for Bin Vents.
S006	007		Slaking/Hydration of Calcium Oxide from Lime Kiln. Exhaust is vented to a Cyclone with Water Spray.	In House Designed Cyclone Type Dust Collector with Water

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Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
				Spray.
S007	008		Fugitive Dust Emissions from Truck Traffic and Exposed Grounds.	Watering, Speed Limits, Gravel, Minimal Disturbance, Natural Vegetation

SECTION II - Specific Permit Terms

1. S001 - B&W Model FM-120#97C, SN: FM-2895 Natural Gas Fired Boiler

	Permit Condition	Limit	tations	Compliance	Monito	Monitoring	
Parameter	Number	Short Term	Long Term	Compliance Emission Factor	Method	Interval	
NOx	1.1	0.20 lb/MMBTU	132.9 TPY	208.0 lbs/MMscf	CEM System, Calculation,	Monthly	
СО		N/A	563.6 TPY	190.3 lbs/MMscf	Recordkeeping		
VOC	1.2	N/A	6.0 TPY	9.4 lbs/MMscf	Recordkeeping	Monthly	
SO_2			5.0 TPY	7.8 lbs/MMscf	& Calculation		
PM			10.0 TPY	15.7 lbs/MMscf			
PM10			10.0 TPY	15.7 lbs/MMscf			
PM	1.3	0.124 lb/MMBTU	N/A	N/A	Fuel Restriction & Recordkeeping	Annually	
CEM NOx	1.4	Installation,	Calibration, Cal Reporting.	culation, Testing,	As Per 40 CFR 60	As Specified	
СО	1.5		1 2			1	
NSPS General Provisions	1.6	Shall not conceal emissions. Records of startup, shutdown, and malfunction shall be kept.			Regulation No. 6, Part A, Subpart A	At All Times	
Fuel Use	1.7	N/A	1,277.5 MMscf/yr	N/A	Fuel Meter	Monthly	
Opacity	1.8	Less than	or equal to 30%	during start-up	Fuel Restriction	Semi- Annually	

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	Permit	Limit	ations	~	Monito	ring
	Condition	61		Compliance		
Parameter	Number	Short Term	Long Term	Emission Factor	Method	Interval
	1.9	Less than	-	during normal	Restriction	Annually
			operation			
Operating Hours &	1.10		N/A		Recordkeeping	Monthly
Steam Generation						

- 1.1 Oxides of Nitrogen (NOx) and Carbon Monoxide (CO) emissions shall not exceed the limitations stated above (Construction Permit 96WE674).
 - 1.1.1 Measured emissions from the Continuous Emissions Monitor, in lbs/hr and lbs/MMBTU (for NOx), shall be used to demonstrate compliance with the above limitations.
 - 1.1.2 A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data. Emissions shall be calculated by the end of each subsequent month.
- 1.2 Volatile Organic Compounds (VOC), Sulfur Dioxide (SO₂), Particulate Matter (PM), and Particulate Matter under 10 Microns (PM₁₀) emissions shall not exceed the limitations stated above for each engine (Construction Permit 96WE674).
 - 1.2.1 Monthly emissions of each pollutant shall be calculated using the listed compliance emission factors (EF) (Source requested for VOC, SO₂, PM and PM₁₀ Source Classification Codes: SCC 1-02-006-01) and the monthly fuel consumption in the following equation:

lb/month = (EF in lbs/MMscf) X (Monthly Fuel Use in MMscf)

1.2.2 A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. For each month that any amount of fuel is combusted, a new twelve month total shall be calculated using the previous twelve months data. Emissions shall be calculated by the end of each subsequent month.

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- 1.3 Particulate Matter (PM) emissions shall not exceed the short term limitation stated above as calculated from the equation PE = 0.5(FI)-0.26 = lbs/MMBTU. In the equations, FI = Fuel Input in MMBTU per hour (Regulation No. 1, Section III, A.1.b.).
 - 1.3.1 The total allowable Particulate Emissions (PE) rate (for each unit) is the value calculated from the equation in 1.3. Allowable Particulate Matter emissions for the boiler using the maximum design rate of 215.9 MMBTU/hr is 0.124 lb/MMBTU.
 - 1.3.2 Source shall burn only natural gas in the boiler to monitor compliance with the Reg 1 standard.
- 1.4 A continuous emission monitoring (CEM) system for measurement of Nitrogen Oxides (NOx) shall be installed, calibrated, and maintained in accordance with the procedures noted below (Colorado Construction Permit 96WE674):
 - 1.4.1 Quality Control Procedures: A quality assurance/quality control plan shall be prepared for the systems. The plan shall be reviewed annually and updated as required to reflect current practices. The plan shall be made available for Division review upon request. The annual compliance certification shall include a statement that the existing plan has been reviewed and updated as necessary, and report the date of the most current issue of the plan shall be identified on the annual compliance certification. The quality control activities shall conform to or exceed the requirements set forth in the Performance Specifications 2 in Appendix B to 40 CFR Part 60, and the requirements in Appendix F to 40 CFR Part 60.
 - 1.4.2 Emission Rate Calculation: The emission rate monitored by the CEM shall be expressed as a 1-hr average in lbs/MMBTU. At least 2 data points must be used to calculate each 1-hr average. A minimum of one cycle of operation (sampling, analyzing, and recording) shall be performed for each successive 15-minute period. Compliance with the lbs/MMBTU limitation of 1.1 shall be determined on a 30-day rolling average basis [40 CFR 60.48b(d); 60.13(e)(2); 60.44b(l)]. All evaluation results shall be calculated in accordance with Section 6 of Appendix B to 40 CFR Part 60.
 - 1.4.3 CEM Failure: The lbs/MMBTU standard shall apply at all times including periods of startup, shutdown, or malfunction. The CEM shall be operated and data recorded during all periods of operation except for CEM system breakdowns and repairs. Data shall be recorded during calibration checks, and zero and span adjustments. When emissions data can not be obtained due to a CEM system breakdowns, repairs, calibration checks and zero and span adjustments, emission data shall be calculated using the highest emissions values (lbs/hr and lbs/MMBTU) measured from the previous 30 days. [40 CFR 60.44b(h); 60.48b(c); 60.48b(f)]

- 1.4.4 Calibration Drift: Calibration drift shall be performed daily in accordance with the requirements of Appendix F to 40 CFR Part 60. The span value shall be 500 ppm NOx [40 CFR 60.48b(2)].
- 1.4.5 Relative Accuracy: Relative accuracy evaluations shall be performed in accordance with Section 5 of Appendix F to 40 CFR Part 60. The CEMS must be audited once per quarter while the boiler is in operation. A Relative Accuracy Test Audit (RATA) shall be performed during at least one quarter each campaign while the boiler is in operation. During the other quarters that the boiler is in operation, a Cylinder Gas Audit (CGA), Relative Accuracy Audit (RAA), or other alternative audit procedure as approved by the Division shall be performed.
- 1.4.6 Reports: The results of the Calibration Drift and Relative Accuracy evaluations shall be submitted in a format approved by the Division. An excess emissions report shall be submitted to the Division within thirty (30) days following the end of each calendar quarter. The report shall provide detailed information on the quarterly emissions in excess of 0.20 lb/MMBTU of NOx. The report shall be in a format approved by the Division and include the nature and cause of the excess emissions.
- 1.4.7 Initial Test Protocols: Protocols for the Relative Accuracy evaluations, RATA, and RAA, shall be submitted to the Division 30 days prior to the intended evaluation date. The Division reserves the right to witness the test. The Division shall provide notification if a Division representative will be present at the test the testing shall not commence until said representative is present.
- 1.4.8 General Requirements: All test and monitoring equipment, methods, procedures and reporting shall be subject to the review and approval by the Division prior to any official use. The Division shall have the right to inspect such equipment, methods, procedures, and data obtained at reasonable times.
- 1.5 A continuous emission monitoring (CEM) system for measurement of Carbon Monoxide (CO) shall be installed, calibrated, and maintained in accordance with the procedures noted below (Colorado Construction Permit 96WE674):
 - 1.5.1 Installation, Calibration and Operation shall be in accordance with 40 CFR Part 60 Subpart A.
 - 1.5.2 Recordkeeping and Reporting shall be in accordance with 40 CFR Part 60 Subpart A.
 - 1.5.3 Initial certification shall be in accordance with 40 CFR Part 60 Appendix B.
 - 1.5.4 Quality Assuarance and Quality Control measures shall be in acordance with 40 CFR Part 60 Appendix F.

- 1.6 The following requirements of Regulation No. 6, Part A, Subpart A, General Provisions (40 CFR Part 60 Subpart A incorporated by reference) apply as follows:
 - 1.6.1 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
 - 1.6.2 Records of startups, shutdowns, and malfunctions shall be maintained.
- 1.7 Fuel consumption shall not exceed the limitations stated above (Construction Permit 96WE674).
 - 1.7.1 use shall be measured and recorded by the fifth day of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data. The fuel consumption total need only be updated for months in which fuel (any amount) is consumed.
- Opacity resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment shall not exceed 30% as stated in Colorado Regulation No. 1, Section II, A.4. In the absence of evidence to the contrary, compliance with the 30% opacity limit shall be presumed whenever natural gas is used as fuel for this boiler.
- 1.9 Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for this boiler.
- 1.10 For each operating day, the calendar date, number of boiler operating hours, and hourly steam load shall be recorded [40 CFR 60.49b(p)].

2. S004a - Sugar Granulator: Steam Heated Rotary Dryer

Parameter	Permit Condition Number	Limitations	Compliance Emission Factors- Each Granulator	Monito Method	ring Interval
PM	2.1	29.1 lbs/hr	0.08 lbs/Ton	Recordkeeping,	Annually
PM_{10}		N/A	0.08 lbs/Ton	Calculation	
Opacity	2.2	Less than or equal to 20%	N/A	Visual Checks, Maintenance, EPA Method 9	Monthly Checks and EPA Method 9 as Needed
Dust Box Operation	2.3	Good Maintenance and Operating Procedures	N/A	Maintenance & Recordkeeping	As Needed

- 2.1 Particulate Matter (PM) emissions shall not exceed the short term limitation stated above as calculated from the equation $PE = 3.59(P)^{0.62} = lbs/hr$, where P = Process Weight Rate in tons per hour (Regulation No. 1, Section III, C.1.a.).
 - 2.1.1 The allowable Particulate Emissions (PE) rate shall be calculated using the given maximum design process weight rate of 29.17 ton/hr resulting in a calculated PE of 29.1 lbs/hr.
 - 2.1.2 Annual emissions of PM and PM_{10} shall be calculated using the emission factors listed above (Source Provided Emission Factors Includes Control Efficiency) and sugar processed in the following equation:

Lbs/year = (EF) X (Sugar Processed in TPY)

- 2.1.3 The In-House Designed dust boxes with water suppression shall be operated as under 4.3 while the granulators are in operation.
- 2.1.4 Sugar throughput tonnage shall be measured and recorded annually.
- 2.2 Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. Visual observations shall be performed using EPA Method 9. The following monitoring requirements apply during periods of operation:

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- 2.2.1 A check of visible emissions (**not** EPA Method 9) shall be performed monthly. Should visible emissions, other than steam, be observed, the source shall:
 - 2.2.1.1 Verify that the process and control equipment are operating properly.
 - 2.2.1.2 Perform any maintenance or adjustments needed to minimize visible emissions and ensure that the process and control equipment are operating properly.
 - 2.2.1.3 Record any maintenance or adjustments performed in order to minimize visible emissions and ensure proper operation.
 - 2.2.1.4 Conduct an additional check of visible emissions (**not** EPA Method 9) after performing the above activities. Should visible emissions still persist, the source shall perform an EPA Method 9 observation within 24 hours.
- 2.2.2 Should any EPA Method 9 observation result (6 minute average) indicate opacity exceeding 10%, the source shall perform monthly visual observations for the subsequent four (4) months. The source shall continue the visual observations into the next campaign (or period of operation) should the existing campaign end before all required observations are performed.

(Note: The 10% opacity level is used only to govern monitoring frequency - it is not a standard)

- 2.2.3 The control equipment shall be operated as under 4.3 while the granulators are in operation.
- 2.3 The In-House Designed dust boxes with water suppression shall be maintained and operated in accordance with good operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. Specifically:
 - 2.3.1 Inlet air and exhaust fans shall be operated when granulators are in use. Water spray shall be sufficient to minimize opacity and/or particulate emissions.
 - 2.3.2 Process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to treatment by the dust boxes.
 - 2.3.3 Records of dust box maintenance shall be kept.

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3. S004b - Sugar Granulator: Ambient Air Coolers

Parameter	Permit Condition Number	Limitations	Compliance Emission Factors- Each Granulator	Monito Method	oring Interval
Faranietei	Number	Limitations	Each Granulator	Method	IIILEI Vai
PM	3.1	29.1 lbs/hr	0.008 lbs/Ton	Recordkeeping	Monthly
PM_{10}		N/A	0.008 lbs/Ton	Calculation	
Opacity	3.2	Less than or equal to 20%	N/A	Visual Checks, Maintenance, EPA Method 9	Monthly Checks and EPA Method 9 as Needed
Baghouse Operation	3.3	Manufacturer's Recommendations & Good Maintenance and Operating Procedures	N/A	Maintenance & Recordkeeping	As Needed

- 3.1 Particulate Matter (PM) emissions from the cooler combined shall not exceed the short term limitation stated above as calculated from the equation $PE = 3.59(P)^{0.62} = lbs/hr$, where P = Process Weight Rate in tons per hour (Regulation No. 1, Section III, C.1.a.).
 - 3.1.1 For the cooler, the allowable Particulate Emissions (PE) rate shall be calculated using the given maximum design process weight rate of 29.17 ton/hr for both coolers combined (coolers are connected to a single control device). The total cooler allowable PE rate is then calculated to be 29.1 lbs/hr.
 - 3.1.2 Annual emissions of PM and PM₁₀, for the cooler, shall be calculated using the emission factors listed above (Source Provided Emission Factors Includes Control Efficiency) and sugar processed in the following equation:

Lbs/year = (EF) X (Sugar Processed in TPY)

- 3.1.3 The control equipment shall be operated as under 2.6 while the coolers are in operation.
- 3.1.4 Sugar throughput tonnage shall be measured and recorded annually.

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- 3.2 Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. Visual observations shall be performed using EPA Method 9. The following monitoring requirements apply during periods of operation:
 - 3.2.1 A check of visible emissions (**not** EPA Method 9) shall be performed monthly. Should visible emissions, other than steam, be observed, the source shall:
 - 3.2.1.1 Verify that the process and control equipment are operating properly.
 - 3.2.1.2 Perform any maintenance or adjustments needed to minimize visible emissions and ensure that the process and control equipment are operating properly.
 - 3.2.1.3 Record any maintenance or adjustments performed in order to minimize visible emissions and ensure proper operation.
 - 3.2.1.4 Conduct an additional check of visible emissions (**not** EPA Method 9) after performing the above activities. Should visible emissions still persist, the source shall perform an EPA Method 9 observation within 24 hours.
 - 3.2.2 Should any EPA Method 9 observation result (6 minute average) indicate opacity exceeding 10%, the source shall perform monthly visual observations for the subsequent four (4) months. The source shall continue the visual observations into the next campaign (or period of operation) should the existing campaign end before all required observations are performed.

(Note: The 10% opacity level is used only to govern monitoring frequency - it is not a standard)

- 3.2.3 The control equipment shall be operated as under 4.3 while the granulators are in operation.
- 3.3 The cooler's control equipment shall be maintained and operated in accordance with manufacturer's recommendations and good operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. Specifically:
 - 3.3.1 Inlet air and exhaust fans shall be operated when coolers are in use.
 - 3.3.2 Process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to treatment by the baghouse.
 - 3.3.3 Records of baghouse maintenance shall be kept.

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4. S005a - Conveyor Transfer Points and Silo Filling: Wheelabrator as Control Equipment

	Permit Condition		Compliance	Monito	ring
Parameter	Number	Limitations	Compliance Emission Factors-	Method	Interval
PM	4.1 *	33.3 lbs/hr	0.00716 lb/Ton	Recordkeeping,	Annually
PM_{10}		N/A	0.00329 lb/Ton	Calculation	
Sugar Production		N/A	N/A	Recordkeeping	Monthly
Opacity	4.2*	Less than or equal to 20%	N/A	Visual Checks, Maintenance, EPA Method 9	Monthly Checks and EPA Method 9 as Needed
Control Equipment Operation	4.3*	Good Maintenance and Operating Procedures	N/A	Maintenance & Recordkeeping	As Needed

^{*}Conditions under S006b apply after the removal of the Wheelabrator control device. (See Section I, Condition 2.1)

- Particulate Matter (PM) emissions shall not exceed the short term limitation stated above as calculated from the equation $PE = 17.31(P)^{0.16} = lbs/hr$, where P = Process Weight Rate in tons per hour (Regulation No. 1, Section III, C.1.a.).
 - 4.1.1 The allowable Particulate Emissions (PE) rate shall be calculated using the given maximum design process weight rate of 60 ton/hr. The PE is then calculated to be 33.3 lbs/hr.
 - 4.1.2 Emission factors were calculated from EPA Document AP-42, Compilation of Air Pollutant Emission Factors, 13.2.4.3 Predictive Emission Factor Equations, 1/95:

$$EF = \frac{k (0.0032) (U/5)^{1.3}}{(M/2)^{1.4}}$$

Where k = Particle size multiplier (dimensionless)

U = Mean wind speed (miles per hour)

M = Material moisture content (%)

For these activities, k = 0.74 for PM and 0.35 for PM₁₀; U = 0.1 mph; M = 0.024%. Annual emissions of PM and PM₁₀ shall be calculated using the emission factors listed above, sugar processed, and a control efficiency of 50% in the following equation:

Lbs/year = (EF) X (Sugar Processed in TPY) X (100%-50%)/100

- 4.1.3 The Wheelabrator 126-D shall be operated as under 3.3 while "fugitive" type emissions are present.
- 4.1.4 Sugar production throughput tonnage shall be measured and recorded annually.
- 4.2 Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. Visual observations shall be performed using EPA Method 9. The following monitoring requirements apply during periods of operation:
 - 4.2.1 A check of visible emissions (**not** EPA Method 9) shall be performed monthly. Should visible emissions, other than steam, be observed, the source shall:
 - 4.2.1.1 Verify that the process and control equipment are operating properly.
 - 4.2.1.2 Perform any maintenance or adjustments needed to minimize visible emissions and ensure that the process and control equipment are operating properly.
 - 4.2.1.3 Record any maintenance or adjustments performed in order to minimize visible emissions and ensure proper operation.
 - 4.2.1.4 Conduct an additional check of visible emissions (**not** EPA Method 9) after performing the above activities. Should visible emissions still persist, the source shall perform an EPA Method 9 observation within 24 hours.
 - 4.2.2 Should any EPA Method 9 observation result (6 minute average) indicate opacity exceeding 10%, the source shall perform monthly visual observations for the subsequent four (4) months. The source shall continue the visual observations into the next campaign (or period of operation) should the existing campaign end before all required observations are performed.

(Note: The 10% opacity level is used only to govern monitoring frequency - it is not a standard)

4.2.3 The control equipment shall be operated as under 5.3 while the conveyors are in operation.

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- 4.3 The Wheelabrator 126-D shall be maintained and operated in accordance with manufacturer's specifications to minimize emissions and monitor compliance with the particulate and opacity standards. Specifically:
 - 4.3.1 Exhaust fans shall be operated whenever "fugitive" type emissions are present. Water spray shall be sufficient to minimize opacity and/or particulate emissions.
 - 4.3.2 Equipment and storage vessels shall be maintained and operated to minimize leakage of air contaminants to the atmosphere prior to treatment by the Wheelabrator.
- 4.4 The device shall be inspected monthly to ensure that no tears or leaks are present. Records of maintenance shall be maintained.

5. S005b - Conveyor Transfer Points and Silo Filling: Baghouse Upgrade as Control Equipment

	Permit Condition		Compliance	Monitor	ing
Parameter	Number	Limitations	Emission Factors	Method	Interval
PM	5.1 *	33.3 lbs/hr	Dust Collectors - 0.013 lb/ton	Recordkeeping, Calculation	Monthly
			Bin Vent Collector- 0.0064 lbs/ton		
PM_{10}		N/A	Dust Collectors - 0.013 lb/ton		
			Bin Vent Collector- 0.0064 lb/ton		
Sugar Production		N/A	N/A	Recordkeeping	Monthly
Opacity	5.2 *	Less than or equal to 20%	N/A	Visual Checks, Maintenance, EPA Method 9	Monthly Checks and EPA Method 9 as Needed
Control Equipment Operation	5.3 *	Manufacturer's Recommendations & Good Maintenance and Operating Procedures	N/A	Maintenance & Recordkeeping	As Needed

^{*}Conditions under S006a apply while the Wheelabrator control device is in place and operating. (See Section I, Condition 2.1)

- 5.4 Particulate Matter (PM) emissions shall not exceed the short term limitation stated above as calculated from the equation $PE = 17.31(P)^{0.16} = lbs/hr$, where P = Process Weight Rate in tons per hour (Regulation No. 1, Section III, C.1.a.).
 - 5.4.1 The allowable Particulate Emissions (PE) rate shall be calculated using the given maximum design process weight rate of 60 ton/hr. The PE is then calculated to be 33.3 lbs/hr.

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- 5.4.2 Emissions from each unit shall be calculated monthly using the emission factor listed above (Manufacturer Derived and Include Control efficiency) and monthly sugar production. Source will record monthly production during the beet campaign. Emissions shall also be calculated annually for fee and inventory purposes.
- 5.4.3 Note that "Dust Collectors" refers to the two (2) Sly PleatJet control devices while "Bin Vent Collector" refers to the MicroPulseaire unit.
- 5.4.4 The dust collectors shall be operated when sugar is being conveyed and the bin vent dust collector shall be used when a bin is in use.
- 5.5 0.1. Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. Visual observations shall be performed using EPA Method 9. The following monitoring requirements apply during periods of operation:
 - 5.5.1 A check of visible emissions (**not** EPA Method 9) shall be performed monthly. Should visible emissions, other than steam, be observed, the source shall:
 - 5.5.1.1 Verify that the process and control equipment are operating properly.
 - 5.5.1.2 Perform any maintenance or adjustments needed to minimize visible emissions and ensure that the process and control equipment are operating properly.
 - 5.5.1.3 Record any maintenance or adjustments performed in order to minimize visible emissions and ensure proper operation.
 - 5.5.1.4 Conduct an additional check of visible emissions (**not** EPA Method 9) after performing the above activities. Should visible emissions still persist, the source shall perform an EPA Method 9 observation within 24 hours.
 - 5.5.2 Should any EPA Method 9 observation result (6 minute average) indicate opacity exceeding 10%, the source shall perform monthly visual observations for the subsequent four (4) months. The source shall continue the visual observations into the next campaign (or period of operation) should the existing campaign end before all required observations are performed.

(Note: The 10% opacity level is used only to govern monitoring frequency - it is not a standard)

5.5.3 The dust collectors shall be operated when sugar is being conveyed and the bin vent dust collector shall be used when a bin is in use.

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- 5.6 The dust collectors and bin dust collector shall be maintained and operated in accordance with manufacturer's specifications to minimize emissions and monitor compliance with the particulate and opacity standards. Specifically:
 - 5.6.1 The two Sly PleatJet dust collectors shall be operated when sugar is being conveyed through the systems connected to the dust collectors. The bin vent filters shall be operated while the particular bin is in use.
 - 5.6.2 Equipment and storage vessels shall be maintained and operated to minimize leakage of air contaminants to the atmosphere prior to treatment by the dust collectors.
 - 5.6.3 The dust collectors shall be inspected monthly to ensure that no tears or leaks are present. Records of maintenance shall be maintained.

6. S006 - Slaking/Hydration of Calcium Oxide from Lime Kiln

	Permit Condition		Compliance	Monito	oring
Parameter	Number	Limitations	Compliance Emission Factors	Method	Interval
PM	6.1	8.7 lbs/hr	0.068 lb/ton	Recordkeeping,	Annually
PM_{10}		N/A	0.068 lb/ton	Calculation	
CaO Consumption		N/A	N/A	Recordkeeping	Annually
Opacity	6.2	Less than or equal to 20%	N/A	Visual Checks, Maintenance, EPA Method 9	Monthly Checks and EPA Method 9 as Needed
Control Equipment Operation	6.3	Good Maintenance and Operating Procedures	N/A	Maintenance & Recordkeeping	As Needed

- 6.1 Particulate Matter (PM) emissions shall not exceed the short term limitation stated above as calculated from the equation $PE = 3.59(P)^{0.62} = lbs/hr$, where P = Process Weight Rate in tons per hour (Regulation No. 1, Section III, C.1.a.).
 - 6.1.1 The allowable Particulate Emissions (PE) rate in the above equation shall be calculated using the given maximum design process weight rate of 4.17 ton CaO/hr. The PE is then calculated to be 8.7 lbs/hr.
 - Annual emissions of PM and PM₁₀ shall be calculated using the emission factors listed above (January 1995 Stack Test of Slaker Vent Without Controls at Western Sugar's Scottsbluff, Nebraska Facility), limestone consumption, and a control efficiency of 50% in the following equation:

Lbs/year = (EF) X (Limestone Consumption) X (100%-50%)/100

6.1.3 The in-house designed cyclone with water spray dust collector shall be operated as under 4.3 while lime slaker is in operation.

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- 6.2 Opacity shall not exceed 20% as stated in Regulation No. 1, Section II, A. Visual observations shall be performed using EPA Method 9. The following monitoring requirements apply during periods of operation:
 - 6.2.1 A check of visible emissions (**not** EPA Method 9) shall be performed monthly. Should visible emissions, other than steam, be observed, the source shall:
 - 6.2.1.1 Verify that the process and control equipment are operating properly.
 - 6.2.1.2 Perform any maintenance or adjustments needed to minimize visible emissions and ensure that the process and control equipment are operating properly.
 - 6.2.1.3 Record any maintenance or adjustments performed in order to minimize visible emissions and ensure proper operation.
 - 6.2.1.4 Conduct an additional check of visible emissions (**not** EPA Method 9) after performing the above activities. Should visible emissions still persist, the source shall perform an EPA Method 9 observation within 24 hours.
 - 6.2.2 Should any EPA Method 9 observation result (6 minute average) indicate opacity exceeding 10%, the source shall perform monthly visual observations for the subsequent four (4) months. The source shall continue the visual observations into the next campaign (or period of operation) should the existing campaign end before all required observations are performed.

(Note: The 10% opacity level is used only to govern monitoring frequency - it is not a standard)

- 6.2.3 The control equipment shall be operated as under 6.3 while lime slacker is in operation.
- 6.3 The in-house designed cyclone with water spray dust collector shall be maintained and operated in accordance with good operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. Specifically:
 - 6.3.1 Exhaust fans shall be operated whenever the lime slaker is in operation. Water spray shall be sufficient to minimize opacity and/or particulate emissions.
 - 6.3.2 Process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to treatment by the wet scrubber
 - 6.3.3 Records of cyclone maintenance shall be kept.

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7. S007 - Fugitive Dust Emissions from Truck Traffic and Exposed Grounds

	Permit Condition		Compliance	Monitor	ring
Parameter	Number	Limitations	Emission Factors	Method	Interval
PM and PM ₁₀	7.1	None	N/A	Recordkeeping	As Needed
Control Measures		Minimize Fugitive Particulate Emissions	N/A	Measures as Necessary	As Needed

- 7.1 Control measures and operating procedures shall be employed as necessary to minimize fugitive particulate emissions into the atmosphere (Colorado Regulation No. 1, Section III, Part D).
 - 7.1.1 A fugitive dust control plan, or modification to an existing plan, shall be required to be submitted if the Division determines that for this source or activity visible emissions are in excess of 20% opacity; or visible emissions are being transported off the property; or if this source or activity is operating with emissions that create a nuisance. The control plan shall be submitted to the Division within the time period specified by the Division. (Colorado Regulation No. 1, Section III, Part D.1.c.)
 - 7.1.2 In the event that a control plan is required, it shall be a violation of this permit to operate an activity for which a control plan has been disapproved or to fail to comply with the provisions of an approved control plan. (Colorado Regulation No. 1, Section III, Part D.1.e.i.B&C)

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SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part A, § I.B.43; Part C, §§ V.C.1.b. & D., XIII; §§ 25-7-111(2)(I), 25-7-114.4(3)(a), C.R.S.

1. Specific Conditions

The following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued:

Emission Unit Description & Number	Applicable Requirement	Justification
S002 - S006	Colorado Regulation No. 6, Part B, III., Standards of Performance for New Stationary Sources, Standards of Performance for New Manufacturing Processes.	Manufacturing process was not constructed, reconstructed, or modified after the January 30, 1979 applicability date.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- 2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;
- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;
- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

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- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

SECTION IV - General Permit Conditions

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.36.a. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&e. and V.C.17.

- a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- c. Compliance certifications shall contain:
 - (I) the identification of each permit term and condition that is the basis of the certification;
 - (ii) the compliance status of the source;
 - (iii) whether compliance was continuous or intermittent;
 - (iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the

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Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., § 25-7-122.1(2), C.R.S.

- a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the

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applicable requirements on which it is based.

- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
 - (I) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit

4. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within

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one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or upset provision contained in any applicable requirement.

5. Emission Standards for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

6. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

7. Fee Payment

Regulation No. 3, 5 CCR 1001-5, Part A, § VI.; Part C, § V.C.12.

- a. The permittee shall pay an annual emissions fee in accordance with Regulation No. 3, Part A, Section VI. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount
- b. The permittee shall pay a permit processing fee of \$50 per hour. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.
- c. The permittee shall pay an APEN fee of \$100 for each APEN or revised APEN filed.

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8. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

9. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissionsrelated activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

10. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

11. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under

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the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

12. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

13. Odor

Regulation No. 2, 5 CCR 1001-3

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

14. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit . The permit shield shall not apply to any off-permit change.

15. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

16. Open Burning

Regulation No. 1, 5 CCR 1001-3, §§ II.C.1.

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 1, §§ II.C.1.

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17. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

18. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

19. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

20. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Unless required by a permit term or condition to report deviations on a more frequent basis, "prompt" reporting shall entail submission of reports of deviations from permit requirements every six (6) months in accordance with paragraph 21.d. below. "Prompt reporting" does not constitute an

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exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

21. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (I) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.
- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years onsite at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.
- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the enhanced monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

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e The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division

22. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the

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reopening and reissuance procedure.

23. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

24. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable

25. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

26. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act

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or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

27. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

28. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

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29. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

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OPERATING PERMIT APPENDICES

- A INSPECTION INFORMATION
- **B COMPLIANCE MONITORING REPORT FORMAT**
- C COMPLIANCE CERTIFICATION REPORT FORMAT
- **D-NOTIFICATION ADDRESSES**
- **E-PERMIT ACRONYMS**
- F PERMIT MODIFICATIONS

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable and is presented to assist the source, permitting authority, inspectors, and citizens.

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APPENDIX A - Inspection Information

1. **Directions to Plant:**

North on US Highway 85 from Denver to the city of Greeley. The highway passes within 1 block of the factory. Exit the highway and travel East to 1st Avenue. The main factory is located at approximately 13th Street and 1st Avenue.

2. Safety Equipment Required:

Eye Protection Hard Hat Hearing Protection

3. Facility Plot Plan:

The attached figure shows the plot plan as submitted on December 7, 1995 with the source's Title V Operating Permit Application.

4. List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

In-house laboratory equipment for quality control

Individual pieces of fuel burning equipment with a design rate of <5 MMBTU/hr

Chemical storage tanks or totes with a capacity of less than 500 gallons and daily throughput of less than 25 gallons

Lawnmower and snowblower

Chemical storage of process chemicals in closed totes with less than 5000 gallons total.

Storage tanks and totes of lubricating oils with much less than 40,000 gallons

Underground storage tanks of diesel fuel, primarily used during beet trucking, with less than 300,000 gallon annual throughput

Individual small space heaters

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APPENDIX B - Format for Compliance Monitoring Report - Part I

- 1. Following is the format for compliance monitoring reports to be submitted to the Division on a semi-annual basis. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- 2. Part II of this Appendix B shows the format and information the Division will require for describing periods of non-compliance, monitor/meter down time, or upset conditions as indicated in the Table below. One Form must be completed for each Operating Permit Unit ID, as warranted.

FACILITY NAME: The Western Sugar Cooperative - Greeley Facility OPERATING PERMIT NO: 950PWE083 REPORTING PERIOD:

Operating		Status	oliance During iod ¹		or/Meter n Time ²	Reporte	Condition d During riod
Permit Unit ID	Unit Description	IN	OUT	YES	NO	YES	NO
S001	B&W Model FM-120#97C, SN: FM-28(93,94, or 95 - to be determined upon installation), natural gas fired steam boiler						
S004	Sugar Granulator consisting of Steam Heated Rotary Dryer and Ambient Air Cooled Rotary Cooler.						
S005	Conveyor Transfer Points and Silo Filling. Dust is Picked up from the Transfer Points, Loading Areas, and from the Displacement of Air from Silo Filling and Vented to a Cyclone.						
S006	Slaking/Hydration of Calcium Oxide from Lime Kiln.						
S007	Fugitive Dust Emissions from Truck Traffic						

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Operating		Compliance Status During Period ¹		Monitor/Meter Down Time ²		Upset Condition Reported During Period	
Permit Unit ID	Unit Description	IN	OUT	YES	NO	YES	NO
	and Exposed Grounds.						
	Insignificant Activities ³						
	General Conditions						

¹ Compliance status should be marked as "OUT" if the source was not in compliance with a term of the Operating Permit at any time during the reporting period

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²This includes any Continuous Emission Monitor (CEM), Meter or Gauge used to record data necessary for determination of Compliance with a term of the Operating Permit

³ Compliance status for these sources shall be based on a reasonable inquiry using readily available information

Format for Compliance Monitoring Report - Part II

8 4
FACILITY NAME: The Western Sugar Cooperative - Greeley Facility OPERATING PERMIT NO: 950PWE083 REPORTING PERIOD:
OPERATING PERMIT UNIT IDENTIFICATION:
Operating Permit Condition Number Citation
Explanation of Period of Non-Compliance
<u>Duration</u>
Action Taken to Correct the Problem
Measures Taken to Prevent a Reoccurrence of the Problem
Dates of Upsets Reported
Dates of Monitor, Meter Down Time/Steps Taken to Repair

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SEE EXAMPLE ON THE NEXT PAGE

Format for Compliance Monitoring Report

EXAMPLE

OPERATING PERMIT NO: 96OPZZXXX REPORTING PERIOD: 1/1/96 - 6/30/96

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Non-Compliance

Slurry Line Feed Plugged

Duration

START- 1730 4/10/96 END- 1800 4/10/96

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Upsets Reported

4/10/96 to S. Busch, APCD

Dates of Monitor, Meter Down Time/Steps Taken to Repair

N/A

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Format for Compliance Monitoring Report - Part III

TITLE V OPERATING PERMIT

CERTIFICATION FOR SEMI-ANNUAL MONITORING REPORT

SOURCE NAME: The Western Sugar Cooperative - Greeley Facility	

PERMIT NUMBER: 950PWE083

FACILITY IDENTIFICATION NUMBER: 1230002

REPORTING PERIOD:

All information for the Title V Semi-Annual Monitoring Reports must be certified by a responsible official. The responsible official signing this certification must be pre-approved by the Division in accordance with Colorado Regulation No. 3, Part A, Section I.B.54. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this application is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name	Title	
Signature of Responsible Official	Date Signed	

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APPENDIX C - Format for Annual Compliance Certification Reports

		hat the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), s any false material statement, representation, or certification in this document is guilty of a
	y, I cer	ed this certification in its entirety and, based on information and belief formed after reasonable tify that the statements and information contained in this certification are true, accurate and
IV.	Certifi	cation
		1. A Risk Management Plan (will be submitted / was submitted) to the appropriate authority and/or the designated central location by June 20, 1999.
	B.	If subject: This facility (is / is not) in compliance with all of the requirements of 112(r).
III.	Status A.	for the Accidental Release Prevention Program This facility (is subject / is not subject) to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).
	A.	The Facility was out of compliance with the following permit terms during all or part of the Certification period: [LIST SPECIFIC PERMIT TERM - E.G. SECTION II, CONDITION 3.1]
II.		for Specific Permit Conditions:
	В.	This facility has operated in continuous compliance with all terms and conditions of Federal Operating Permit #95OPWE083 for the period beginning through except as specifically noted in the Semi-Annual Monitoring Reports submitted during this period.
I.	Overa	Il Facility Status: This facility is currently in compliance with all terms and conditions of Federal Operating Permit #95OPWE083 except as specifically noted in the Semi-Annual Monitoring Report submitted with this certification.
		AME: The Western Sugar Cooperative - Greeley Facility PERMIT NO: 950PWE083

Operating Permit Number: 95OPWE083 Issued: 12/01/98

misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Air Pollution Control Division
Colorado Operating Permit
Compliance Certification Report

Appendix C Page 2

Printed or Typed Name	Title	
• •		
Signature	Date Signed	

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D - Notification Addresses

1. Air Pollution Control Division

Colorado Department of Public Health and Environment Air Pollution Control Division Operating Permits Unit APCD-SS-B1 4300 Cherry Creek Drive S. Denver, CO 80246-1530

ATTN: Jim King

2. United States Environmental Protection Agency

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice Mail Code 8ENF U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 300 Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Pollution Prevention, State and Tribal Programs Air Program, 8P-AR U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 300 Denver, CO 80202

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APPENDIX E - Permit Acronyms

Listed Alphabetically:

NSPS -

PM -

	netric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EPA -	Environmental Protection Agency
FR -	Federal Register
G -	Grams
Gal -	Gallon
HAPs	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants

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New Source Performance Standards

Particulate Matter

PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

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APPENDIX F - Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
10/26/00	Front information page	Revised name of responsible official
7/10/02	Front information page; Appendix B and C	Revised name of responsible official; revised company name

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